

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

1-80  
CASE NO.

CR-COHN

MAGISTRATE JUDGE  
SNOW

18 USC 1962(d)  
18 USC 1951  
18 USC 892(a)  
18 USC 894(a)  
18 USC 1956(h)

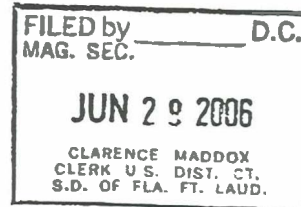
UNITED STATES OF AMERICA,

Plaintiff,

v.

RENALDI RUGGIERO,  
a/k/a Ray,  
JOSEPH DENNIS COLASACCO,  
a/k/a Dennis,  
a/k/a "the Baker,"  
MITCHELL WEISSMAN,  
a/k/a Mitch,  
FRANCIS J. O'DONNELL,  
a/k/a Frank,  
CLEMENT SANTORO,  
a/k/a Clem,  
a/k/a Clemmie,  
ALBERT FACCHIANO,  
a/k/a Al,  
a/k/a Chinky,  
a/k/a "the Chinese guy,"  
a/k/a "the Old Man," and  
CHARLES STEINBERG,  
a/k/a Charley,  
a/k/a "the Fat Man,"

Defendants



INDICTMENT

The Grand Jury charges:

COUNT 1

(RICO Conspiracy, 18 U.S.C. 1962(d))

INTRODUCTION

At all times relevant to this Indictment:

1. The Genovese Organized Crime Family of La Cosa Nostra ("the Genovese Crime Family") was an organized criminal group that operated in the Southern District of Florida and elsewhere. The Genovese Crime Family was supervised and controlled by its hierarchy located in New York, and was one "family" in a nation-wide criminal organization commonly referred to as "La Cosa Nostra," the "mafia," and "this thing of ours."

2. The Genovese Crime Family is a secret criminal organization. The members and associates of the Genovese Crime Family are united by their common criminal interests. While the membership of the Genovese Crime Family and the criminal associates involved therewith changed during the period of time charged in this indictment, and not all members and associates pursued each unlawful end, the structure of the enterprise remained intact.

3. The Genovese Crime Family operated through groups of individuals headed by "captains," who were also referred to as "capos" or "skippers." These groups, which were referred to as "crews" or "regimes," consisted of inducted members of the Genovese Crime Family, who were also referred to as "soldiers" or "made

guys," and of non-member criminal associates of the Genovese Crime Family. The non-member criminal associates were not formally inducted members of the Genovese Crime Family, but engaged in and participated in organized criminal activity, which had been authorized by a "capo" or other "made guy." Members and associates would, at times, engage in criminal conduct or coordinate their criminal activities with leaders, members and associates of other LCN families if authorized by a "capo" or other "made guy."

4. Each "capo" was responsible for supervising the criminal activities of his crew, and provided crew members and associates with support and protection. In return, the "capo" typically received a share of the proceeds earned through the criminal activities of each of the crew's members and associates.

5. The "capo" represented members of the crew in resolving disputes with other members of the Genovese Crime Family, resolving disputes between members of the crew and members of other criminal organizations, and authorized the commission of wide-ranging criminal acts.

6. Defendant RUGGIERO was a "soldier" in the Genovese Crime Family and was thereafter elevated to "capo" in charge of all operations for the Genovese Crime Family in South Florida. Defendant RUGGIERO supervised and directed the activities of members and associates committing criminal acts in the Southern District of Florida, including the members and associates named

herein.

7. Defendant FACCHIANO was a "soldier" in the Genovese Crime Family. Defendant FACCHIANO supervised associates in South Florida, and elsewhere, including at least one of the associates named herein.

8. Defendants COLASACCO, WEISSMAN, O'DONNELL, SANTORO, and STEINBERG were non-member associates of the Genovese Crime Family who were engaged in criminal acts on behalf of the enterprise. The non-members associates would, at various times, commit criminal acts with individuals associated with other criminal crews and other organized crime families with the approval of defendant RUGGIERO and/or defendant FACCHIANO.

9. The Federal Bureau of Investigation (hereinafter "FBI") conducted investigations in which a detective from the Miami-Dade Police Department worked as a task force agent with the FBI in an undercover capacity as a purported drug dealer and money launderer, along with a Special Agent of the FBI who was acting in an undercover capacity, in order to gather evidence concerning criminal activities of the defendants and others engaged in criminal activities on behalf of the racketeering enterprise.

#### THE ENTERPRISE

10. The defendants, and others known and unknown, were members and associates of the Genovese Crime Family. The Genovese Crime Family, including its leadership, membership and associates,

constituted an "Enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. This Enterprise was engaged in, and its activities affected, interstate and foreign commerce.

#### THE PURPOSE AND OBJECT OF THE ENTERPRISE

11. The principal purpose and object of the Enterprise was to generate money for its members and associates through the commission of various criminal acts, including, extortion, robbery, money laundering, making of extortionate extensions of credit, collection of extensions of credit by extortionate means, travel in aid of racketeering, possession of stolen property, and bank fraud, in such a way to avoid detection by law enforcement agents. Among the methods and means by which members and associates of the Genovese Crime Family furthered its criminal activities was the threatened and actual use of force and violence.

THE RICO CONSPIRACY

12. From in or about 1994 and continuing thereafter through the date of the return of the indictment, in the Southern District of Florida, and elsewhere, the defendants:

RENALDI RUGGIERO,  
a/k/a Ray,  
JOSEPH DENNIS COLASACCO,  
a/k/a Dennis,  
a/k/a "the Baker,"  
MITCHELL WEISSMAN,  
a/k/a Mitch,  
FRANCIS J. O'DONNELL,  
a/k/a Frank,  
CLEMENT SANTORO,  
a/k/a Clem,  
a/k/a Clemmie,  
ALBERT FACCHIANO,  
a/k/a Al,  
a/k/a Chinky,  
a/k/a "the Chinese guy,"  
a/k/a "the Old Man," and  
CHARLES STEINBERG,  
a/k/a Charley,  
a/k/a "the Fat Man,"

being persons employed by and associated with the Genovese Crime Family, as described above, an Enterprise engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly, willfully and unlawfully combine, conspire, confederate, and agree, together and with each other, and with persons known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Genovese Crime Family through a pattern of racketeering activity as that term is defined in Title 18, United States Code, Sections 1961(1) and (5),

as set forth herein in paragraph 13, and through the collection of unlawful debt, as that term is defined in Title 18, United States Code, Section 1961(6), as set forth herein in paragraph 15.

THE PATTERN OF RACKETEERING ACTIVITY

13. The pattern of racketeering activity, as defined in Title 18, United States Code, Section 1961(1) and 1961(5), through which the defendants and their co-conspirators agreed to conduct and participate in the conduct of the affairs of the Enterprise consisted of multiple acts involving violations of the following laws:

(a) Extortion, Attempted Extortion, and Conspiracy to Commit Extortion, in violation of Title 18, United States Code, Section 1951;

(b) Extortion, Attempted Extortion and Conspiracy to Commit Extortion, in violation of Sections 836.05 and 777.04 Florida Statutes;

(c) Robbery, Attempted Robbery and Conspiracy to Commit Robbery, in violation of Title 18, United States Code, Section 1951;

(d) Robbery, Attempted Robbery and Conspiracy to Commit Robbery, in violation of Sections 812.13 and 777.04 Florida Statutes;

(e) Money Laundering, in violation of Title 18, United States Code, Section 1956;

(f) Making Extortionate Extensions of Credit and Conspiracy to Make Extortionate Extensions of Credit, in violation of Title 18, United States Code, Sections 892;

(g) Collection of Extensions of Credit by Extortionate Means and Conspiracy to Collect Extensions of Credit by Extortionate Means, in violation of Title 18, United States Code, Section 894;

(h) Interstate Travel or Transportation in Aid of Racketeering, in violation of Title 18, United States Code Section 1952;

(i) Possession of Stolen Property, in violation of Title 18, United States Code, Section 2315; and

(j) Bank Fraud, in violation of Title 18, United States Code, Section 1344.

14. Each defendant agreed that a coconspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

#### COLLECTION OF UNLAWFUL DEBT

15. The collection of unlawful debt through which the defendants and their co-conspirators agreed to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise consisted of the collection from various individuals of unlawful debts, as that term is defined by Title 18, United States Code, Section 1961(6), that is, debts which were

unenforceable under State and Federal law in whole and in part as to principle and interest because of the laws relating to usury and which were incurred in connection with the business of lending money at a rate usurious under State and Federal law, where the usurious rate was at least twice the lawfully enforceable rate.

ROLES AND RESPONSIBILITIES OF THE CONSPIRATORS

16. The members and associates each engaged in diverse crimes on behalf of the Enterprise and had overlapping roles and responsibilities described as follows:

(a) Defendant RUGGIERO, in his capacity as a soldier and then as a "capo" of the Genovese Crime Family, led, supervised, and directed the various criminal activities of the Genovese Crime Family in South Florida in return for a share of the illegal proceeds that were generated by the Enterprise. Defendant RUGGIERO authorized diverse criminal activities for the benefit of the Enterprise, including extortion, robbery, money laundering, loan sharking, possession of stolen property, and bank fraud, among other crimes, and gave instructions to members regarding the manner of which proceeds derived from criminal activities were distributed. Defendant RUGGIERO represented the interests of the crew regarding interactions with other organized crime members and associates. The criminal activities of the crew were perpetrated under RUGGIERO's authority as a member of the Genovese Crime Family.

(b) Defendant FACCHIANO, in his capacity as a soldier of the Genovese Crime Family, supervised and directed various criminal activities of the Genovese Crime Family in South Florida in return for a share of the illegal proceeds that were generated by the Enterprise. Defendant FACCHIANO authorized diverse criminal activities for the benefit of the Enterprise, including loan sharking and bank fraud, among other crimes, and gave instructions to members regarding the manner of which proceeds derived from criminal activities were distributed. Defendant FACCHIANO represented the interests of his associates regarding interactions with other organized crime members and associates. The criminal activities of the crew were perpetrated under FACCHIANO's authority as a member of the Genovese Crime Family.

(c) Defendant COLASACCO was a non-member associate of the Genovese Crime Family. Defendant COLASACCO participated in various criminal activities with members of the Enterprise charged herein. Defendant COLASACCO planned and participated in criminal acts for the benefit of the Enterprise, including extortion, robbery, money laundering, loan sharking, possession of stolen property, and bank fraud, among other crimes, and received and/or demanded the receipt of a portion of the proceeds derived from such criminal activity.

(d) Defendant WEISSMAN was a non-member associate of the Genovese Crime Family. Defendant WEISSMAN participated in various criminal activities with members of the Enterprise charged herein.

Defendant WEISSMAN planned and participated in criminal acts which were perpetrated for the benefit of the Enterprise, including extortion, robbery, money laundering, loan sharking, possession of stolen property, and bank fraud, among other crimes, and received and/or demanded the receipt of a portion of the proceeds derived from such criminal activity.

(e) Defendant O'DONNELL was a non-member associate of the Genovese Crime Family. Defendant O'DONNELL participated in various criminal activities with members of the Enterprise charged herein. Defendant O'Donnell planned and participated in criminal acts which were perpetrated for the benefit of the Enterprise, including extortion and money laundering, among other crimes, and received and/or demanded the receipt of a portion of the proceeds derived from such criminal activity.

(f) Defendant SANTORO was a non-member associate of the Genovese Crime Family. Defendant SANTORO participated in various criminal activities with members of the Enterprise charged herein. Defendant SANTORO participated in criminal acts which were perpetrated for the benefit of the Enterprise, including extortion, among other crimes, and received and/or demanded the receipt of a portion of the proceeds derived from such criminal activity.

(g) Defendant STEINBERG was a non-member associate of the Genovese Crime Family. Defendant STEINBERG participated in various criminal activities with members of the Enterprise charged herein.

Defendant STEINBERG participated in criminal acts which were perpetrated for the benefit of the Enterprise, including robbery, loansharking, and bank fraud, among other crimes, and received and/or demanded the receipt of a portion of the proceeds derived from such criminal activity.

MANNER AND MEANS

17. Among the manner and means by which the defendants and their associates conducted and participated in the conduct of the affairs of the Enterprise, and participated in the collection of at least one unlawful debt, were the following:

(a) Members of the Enterprise affiliated themselves with the Genovese Crime Family in order to facilitate their criminal activities and enhance their reputation and status among other individuals involved in criminal transactions.

(b) Members of the Enterprise committed diverse crimes which included, but were not limited to, acts involving extortion, robbery, money laundering, loan sharking, possession of stolen property, and bank fraud.

(c) Members of the Enterprise received approval from defendant RUGGIERO before engaging in criminal activity. Such Enterprise members received instructions from defendant RUGGIERO as to the manner in which proceeds derived from criminal activities were to be collected and distributed.

(d) Members of the Enterprise engaged in criminal

conduct under the authority of the Genovese Crime Family and divided proceeds generated through criminal activities with other organized crime members and associates.

(e) Members of the Enterprise, at times, participated in criminal activity on behalf of other "soldiers" (made members) of the Genovese Crime Family and other organized crime families. At other times, members of the Enterprise met with members and associates of other organized crime families in order to resolve disputes over their criminal activities.

(f) Members of the Enterprise traveled to New York to meet with other members and associates of the Genovese Crime Family. At least on one occasion an associate of the Genovese Crime Family traveled to South Florida at the request of defendants RUGGIERO and COLASACCO to engage in criminal activity.

(g) Members of the Enterprise used seemingly legitimate businesses in order to launder money. Enterprise members issued checks from these companies in amounts less than \$10,000.

(h) Members of the Enterprise engaged in acts of violence, such as beatings, and threatened acts of violence during the course of engaging in criminal activities and to intimidate persons who appeared to them to be interfering with their criminal activities.

(i) Members of the Enterprise extorted and attempted to extort money from persons whom they believed were in some way

interfering with their criminal activities.

(j) Members of the Enterprise used direct and indirect threats in order to acquire and maintain interests in various legitimate business entities.

(k) Members of the Enterprise robbed and extorted and attempted to rob and extort, by actual and threatened use of force and violence, persons who they knew were engaged in illegal activities, including those persons who were not affiliated with or under the control of, one of the organized crime families.

(l) Members of the Enterprise negotiated and attempted to negotiate fraudulent checks, including those that had been stolen or counterfeited, and shared in the profits.

(m) Members of the Enterprise used various techniques to avoid law enforcement scrutiny of the Enterprise's criminal activities. Enterprise members used coded language to frustrate law enforcement attempts to overhear their discussions. Enterprise members used "throw-away phones," which were cellular telephones that were not traceable to them in order to engage in their most serious criminal conversations. In addition, Enterprise members instructed criminal associates to use pay telephones to ensure that the telephone conversations were not recorded. Enterprise members instructed criminal associates to terminate telephone conversations regarding criminal activity and further instructed such criminal associates to discuss such matters in person.

(n) Members of the Enterprise, in order to avoid the seizure of criminal proceeds by law enforcement, concealed and instructed others to aid in the concealment of their assets.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT 2

(Conspiracy To Commit Extortion, 18 U.S.C. 1951)

INTRODUCTION

1. The allegations set forth in paragraphs 1 through 9 of the Introduction to Count 1 of the Indictment are realleged and incorporated herein by reference.

2. In mid-2003 defendants RUGGIERO, COLASACCO, O'DONNELL, and WEISSMAN were involved in discussions with Victim-1 regarding the purchase of a business that was engaged in interstate commerce.

3. In or about September 2003 defendant COLASACCO became extremely upset with Victim-1 regarding the ownership of the business.

CONSPIRACY TO COMMIT EXTORTION

4. On or about September 26, 2003, defendant COLASACCO received approval from defendant RUGGIERO for the assault and extortion of Victim-1.

5. From in or about September 2003, and continuing to in or about June 2005, in the Southern District of Florida and elsewhere, the defendants,

RENALDI RUGGIERO,  
a/k/a Ray,  
JOSEPH DENNIS COLASACCO,  
a/k/a Dennis,  
a/k/a "the Baker,"  
MITCHELL WEISSMAN,  
a/k/a Mitch,  
FRANCIS J. O'DONNELL,  
a/k/a Frank, and  
CLEMENT SANTORO,  
a/k/a Clem,  
a/k/a Clemmie,

did knowingly and intentionally, combine, conspire, confederate, and agree together and with each other and with persons known and unknown to the Grand Jury, to obstruct, delay and affect commerce and the movement and articles and commodities in commerce by extortion, in that the defendants and their coconspirators agreed to obtain property, that is, \$1.5 million from Victim-1, with his consent, which consent was to be induced by the wrongful use of actual and threatened force, violence and fear.

MANNER AND MEANS OF THE EXTORTION

6. It was part of the conspiracy that defendant COLASACCO contacted defendant SANTORO for the purpose of having defendant SANTORO, travel from New York to South Florida, in order to extort money from Victim-1 by means of force and violence.

7. It was further part of the conspiracy that defendant COLASACCO told defendant WEISSMAN to get items to be used for the assault and extortion, including a "throw-away phone."

8. It was further part of the conspiracy that defendant O'DONNELL, at the request of defendant COLASACCO and with the approval of defendant RUGGIERO, lured Victim-1 to defendant O'DONNELL's office at 9600 W. Sample Road, Coral Springs, Florida, for the purpose of executing the assault and extortion of Victim-1.

9. It was further part of the conspiracy that defendant RUGGIERO contacted defendant COLASACCO approximately two hours before the planned assault and extortion of Victim-1 and instructed defendants COLASACCO and SANTORO to be careful and to take nothing for granted.

10. It was further part of the conspiracy that defendants COLASACCO, WEISSMAN, SANTORO, and O'DONNELL arrived at 9600 W. Sample Road in the morning of the planned assault and extortion of Victim-1.

11. It was further part of the conspiracy that defendant COLASACCO waited in the parking lot and defendants O'DONNELL, WEISSMAN, and SANTORO waited in defendant O'DONNELL's office for Victim-1 to arrive.

12. It was further part of the conspiracy that Victim-1 arrived at defendant O'DONNELL's office and was let into the office by defendant O'DONNELL. Thereafter defendant SANTORO put a gun to

Victim-1's head and pushed him to the couch. Defendant SANTORO demanded that Victim-1 give him \$1.5 million and gave a "post-it" note to Victim-1 with a telephone number to call.

13. It was further part of the conspiracy that while Victim-1 was being assaulted, defendant WEISSMAN, who was secreted in an adjacent office, called defendant COLASACCO on his cellular telephone so that defendant COLASACCO could overhear the assault.

14. It was further part of the conspiracy that after the assault, Victim-1 contacted defendant RUGGIERO in order to identify the individuals involved in the assault and the extortion. Defendant RUGGIERO falsely told Victim-1 that he did not know who was attempting to extort Victim-1 and subsequently told Victim-1 that he would act as an intermediary on Victim-1's behalf, including by falsely telling Victim-1 that he went to New York and met someone who represented the people who sent Victim-1 the message.

15. It was further part of the conspiracy that defendant RUGGIERO discussed with defendant COLASACCO dividing up the proceeds from the extortion of Victim-1 with the other defendants.

16. It was further part of the conspiracy that defendant RUGGIERO received checks and money orders from Victim-1 in payment of the extortionate demand.

All in violation of Title 18, United States Code, Section 1951.

COUNT 3

(Conspiracy to Commit Robbery, 18 U.S.C. 1951)

INTRODUCTION

1. The allegations set forth in paragraphs 1 through 9 of the Introduction to Count 1 of the Indictment are realleged and incorporated herein by reference.

2. In or about early-2002, defendant STEINBERG agreed to assist members of an organized crime family in the robbery of an intended victim/ bookmaker. Defendant STEINBERG knew the bookmaker had a large client base of approximately 1,500 customers of which 500 were in Florida. Defendant STEINBERG was told that the intended victim/bookmaker was not associated with nor protected by an organized crime family.

3. Defendant STEINBERG's coconspirators believed that the bookmaker would be in possession of as much as \$300,000 at the time of the robbery. Defendant STEINBERG was to be paid \$10,000 to assist in the robbery.

4. Prior to assisting in the robbery, defendant STEINBERG received approval from defendant RUGGIERO for his participation in the robbery.

CONSPIRACY TO COMMIT ROBBERY

5. In or about early 2002, in Broward and Palm Beach Counties in the Southern District of Florida and elsewhere, the

defendants,

RENALDI RUGGIERO,  
a/k/a Ray, and  
CHARLES STEINBERG,  
a/k/a Charley,  
a/k/a "the Fat Man,"

did knowingly and intentionally combine, conspire, confederate, and agree together and with each other and with persons known and unknown to the Grand Jury, to obstruct, delay and affect, and attempt to obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully conspire to take and obtain personal property consisting of as much as \$300,000 in cash from the person of a bookmaker, against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property in his custody and possession.

MANNER AND MEANS OF THE ROBBERY CONSPIRACY

6. It was part of the conspiracy that defendant STEINBERG drove with his coconspirators to the area of Boynton Beach, Florida, and waited in the car as two of his coconspirators exited the car and robbed the bookmaker of approximately \$39,000.

7. It was further part of the conspiracy that defendant STEINBERG was paid approximately \$3,000 by his coconspirators for

assisting in the robbery.

8. It was further part of the conspiracy that defendant RUGGIERO attempted to intercede on behalf of defendant STEINBERG in order to obtain the \$10,000 promised to defendant STEINBERG.

All in violation of Title 18, United States Code, Section 1951.

COUNT 4

(Conspiracy to Make Extortionate  
Extensions of Credit, 18 U.S.C. 892(a))

1. From in or about 1994 and continuing thereafter through the date of the return of the indictment, in Broward and Palm Beach Counties, in the Southern District of Florida and elsewhere, the defendants,

RENALDI RUGGIERO,  
a/k/a Ray,  
JOSEPH DENNIS COLASACCO,  
a/k/a Dennis,  
a/k/a "the Baker,"  
MITCHELL WEISSMAN,  
a/k/a Mitch,  
ALBERT FACCHIANO,  
a/k/a Al,  
a/k/a Chinky,  
a/k/a "the Chinese guy,"  
a/k/a "the Old Man," and  
CHARLES STEINBERG,  
a/k/a Charley,  
a/k/a "the Fat Man,"

did knowingly combine, conspire, confederate, and agree with each other and with other persons known and unknown to the grand jury to make extortionate extensions of credit as defined by Title 18, United States Code, Section 891, to individuals in South Florida.

In violation of Title 18, United States Code, Section 892(a).

COUNT 5

(Conspiracy to Collect Extensions of Credit  
By Extortionate Means, 18 U.S.C. 894(a))

1. From in or about 1994 and continuing thereafter through the date of the return of the indictment, in Broward and Palm Beach Counties, in the Southern District of Florida and elsewhere, the defendants,

RENALDI RUGGIERO,  
a/k/a Ray,  
JOSEPH DENNIS COLASACCO,  
a/k/a Dennis,  
a/k/a "the Baker,"  
MITCHELL WEISSMAN,  
a/k/a Mitch,  
ALBERT FACCHIANO,  
a/k/a Al,  
a/k/a Chinky,  
a/k/a "the Chinese guy,"  
a/k/a "the Old Man," and  
CHARLES STEINBERG,  
a/k/a Charley,  
a/k/a "the Fat Man,"

did knowingly combine, conspire, confederate, and agree with each other and with other persons known and unknown to the grand jury to participate in the use of extortionate means to collect and attempt to collect extensions of credit as defined by Title 18, United States Code, Section 891, from individuals in South Florida.

In violation of Title 18, United States Code, Section 894(a).

COUNT 6

(Money Laundering, 18 U.S.C. 1956(h))

INTRODUCTION

1. The allegations set forth in paragraphs 1 through 9 of the Introduction to Count 1 of the Indictment are realleged and incorporated herein by reference.

2. During 2003 defendant O'DONNELL was the owner of International Equity and Finance (IEF) and Survey Research Center (SRC), and was a part owner of United Equity Group, LLC (UEG).

3. In or about 2003 an employee of defendant O'DONNELL formed Remington Capital Funding, LLC (RCF), Remington Partners, LLC (RPL), and Delano Consulting Group, LLC (DCG), and was part owner of UEG.

4. In or about May 2003, a detective from the Miami-Dade Police Department who worked as a task force agent with the FBI in an undercover capacity (the UCA) as a purported drug dealer and money launderer was asked by defendants RUGGIERO, COLASACCO, O'DONNELL, and WEISSMAN if the defendants could launder drug proceeds for a fee.

CONSPIRACY TO COMMIT MONEY LAUNDERING

5. From at least in or about May 2003 through in or about October 2003, in Broward and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants,

RENALDI RUGGIERO,  
a/k/a/ Ray,  
JOSEPH DENNIS COLASACCO,

a/k/a Dennis,  
a/k/a "the Baker,"  
MITCHELL WEISSMAN,  
a/k/a Mitch, and  
FRANCIS J. O'DONNELL,  
a/k/a Frank,

did knowingly combine, conspire, confederate and agree with each other and with other persons known and unknown to the grand jury to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce involving property represented by a law enforcement officer to be proceeds of specified unlawful activity, to wit: the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of said specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(3)(B).

MANNER AND MEANS

6. It was part of the conspiracy that defendants RUGGIERO, COLASACCO, O'DONNELL, and WEISSMAN offered to launder, i.e. "to clean up" money represented to be drug proceeds through a company that defendant O'DONNELL was taking public called Coach Industries (CIGI).

7. It was further part of the conspiracy that defendants RUGGIERO, COLASACCO, WEISSMAN, and O'DONNELL agreed to launder approximately \$280,000 in represented drug proceeds by issuing checks from purportedly legitimate companies in exchange for a 10%

fee.

8. It was further part of the conspiracy that defendant O'DONNELL and a coconspirator provided checks to the UCA that were drawn on IEF, UEG, RPL, RCF, SRC, and DCG, instead of CIGI. Some of these checks were delivered by defendants COLASACCO and WEISSMAN.

All in violation of Title 18, United States Code, Section 1956(h).

RACKETEERING FORFEITURE

1. The allegations contained in Count 1 of this Indictment are hereby repeated, realleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963 in the event of any defendant's conviction under Count 1 of this Indictment.

2. The defendants,

RENALDI RUGGIERO,  
a/k/a Ray,  
JOSEPH DENNIS COLASACCO,  
a/k/a Dennis,  
a/k/a "the Baker,"  
MITCHELL WEISSMAN,  
a/k/a Mitch,  
FRANCIS J. O'DONNELL,  
a/k/a Frank,  
CLEMENT SANTORO.

a/k/a Clem,  
a/k/a Clemmie,  
ALBERT FACCHIANO,  
a/k/a Al,  
a/k/a Chinky,  
a/k/a "the Chinese guy,"  
a/k/a "the Old Man," and  
CHARLES STEINBERG,  
a/k/a Charley,  
a/k/a "the Fat Man,"

i. have acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

ii. have an interest in, security of, claims against, and property and contractual rights which afford a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963 (a)(2);

iii. have property constituting and derived from proceeds obtained, directly and indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

3. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section

1963(a)(1), (a)(2), and (a)(3), include but are not limited to at least \$3,000,000 and all interests and proceeds traceable thereto.

4. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Section 1963.

#### MONEY LAUNDERING FORFEITURE

1. The allegations contained in Count 6 of this Indictment are hereby repeated, realleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 982. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 982 in the event of any defendant's conviction under Count 6 of this Indictment.

(a). All right, title, and interest in any and all property involved in the offense pursuant to Title 18, United States Code, Section 1956(h), for which the defendant is convicted, and all property traceable to such property, including the following:

- 1) all money and other property that was the subject of each transaction, transportation, transmission and transfer pursuant to Section 1956(h);
- 2) all commissions, fees and other property constituting

proceeds obtained as a result of those violations; and

3) all property used in any manner and part to commit and to facilitate the commission of those violations.

(b). The property subject to forfeiture shall include, but not be limited to, the property identified in paragraph 1(a), above, which is expressly incorporated herein.

2. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Section 982.

#### SUBSTITUTE PROPERTY

1. If any of the forfeitable property described above (in the Racketeering Forfeiture and the Money Laundering Forfeiture), as a result of any act and omission of the defendants-

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m) and Title 21, United States Code, Section 982(p), and Rule 32.2 Fed. R. Crim. P. to seek forfeiture


of any other property of said defendant up to the value of the forfeitable property described above.

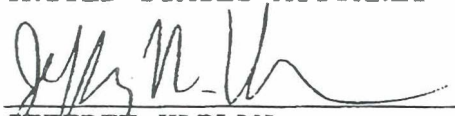
2. Such property to include, but is not limited to:


Real property with building appurtenances and improvements, commonly known as 107 Siena Oaks Circle W, Palm Beach Gardens, Florida, with PCN Number 52-43-42-07-28-000-0070.

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
R. ALEXANDER ACOSTA  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
JEFFREY KAPLAN  
ASSISTANT U.S. ATTORNEY

  
\_\_\_\_\_  
CYNTHIA STONE  
TRIAL ATTORNEY, DEPT. OF JUSTICE  
CRIMINAL DIVISION